

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

M.C.	:	CIVIL ACTION
	:	
Plaintiff,	:	CASE No: 2:09-CV-03240
	:	
v.	:	
	:	
ANTHONY MARK BIANCHI,	:	
Defendant.	:	

**JOINT STIPULATION FOR WITHDRAWAL AND
CANCELLATION OF FILINGS RE: CHARGING LIEN**

The plaintiff, M.C., through his undersigned counsel, and his predecessor counsel, Frost, Van Den Boom & Smith, P.A., formerly known as Frost Tamayo Sessums & Aranda, P.A. (the “Frost Law Firm”), pursuant to (a)(1)(ii) of Rule 41 of the Federal Rules of Civil Procedure, hereby stipulate and agree to the withdrawal and cancellation of the Charging Lien (filed at Docket Entry No. 10) and the Motion to Enforce Charging Lien on a Quantum Meruit Basis and Memorandum of Law (filed at Docket Entry No. 43). The Charging Lien by the Frost Law Firm shall be of no further force and effect, and the Frost Law Firm hereby abandons any claim for fees or costs that the Frost Law Firm may have ever enjoyed on a quantum meruit basis or otherwise.

DATED this 11th day of August, 2011.

Respectfully submitted,

<p>Frost, Van Den Boom & Smith, P.A. P.O. Box 2188 Bartow, Florida 33831-2188 Phone: (863) 533-0314 Email: pwboom@aol.com</p> <p>By: <u>s/ Peter W. van den Boom</u> Admitted Pro Hac Vice</p>	<p>Gherman Legal PLLC Attorney for Plaintiff The Ingraham Building, Eighth Floor 25 Southeast Second Avenue Miami, Florida 33131 Telephone: (305) 582-5700 E-mail: sgherman@ghermanlaw.com</p> <p>By: <u>s/Sergiu Gherman</u> Admitted Pro Hac Vice</p>
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on the 11th day of August, 2011, a copy of the above document was electronically filed using the ECF system, and thereby served upon Michael S. Bomstein, attorney for defendant Anthony Mark Bianchi; John W. Frost II and Peter W. van den Boom, of Frost Van den Boom & Smith, P.A.; and Andrew F. Susko, of White and Williams LLP, on 1800 One Liberty Place, Philadelphia, Pennsylvania 19103-7395. This document has been served by regular and electronic mail upon Mark Browstein.

By: s/Sergiu Gherman